

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA, ex rel.
JOHN M. GREABE,**

Plaintiffs

v.

**BLUE CROSS BLUE SHIELD ASSOCIATION
and ANTHEM BLUE CROSS BLUE SHIELD
OF NEW HAMPSHIRE**

Defendants

Civil Action No. 04-11355 MEL

**RELATOR’S ASSENTED-TO MOTION TO APPROVE AND
ORDER CONFIDENTIALITY AGREEMENTS**

NOW COMES Relator, John M. Greabe, by and through his attorneys, Wiggin & Nourie, P.A., with the assent of the Defendants, and respectfully moves this Honorable Court to approve and order the “[Proposed] Consent Confidentiality Order” and “Stipulated Protective Order Governing Confidential Health Information.”

1. The parties have reached agreements relative to confidential information and protected health information provided in discovery in the above-referenced matter. The “[Proposed] Consent Confidentiality Order” is attached as Exhibit A. The “Stipulated Protective Order Governing Confidential Health Information” is attached as Exhibit B. The parties request that the Court approve and order these agreements.

2. Defendants Blue Cross Blue Shield Association and Anthem Blue Cross Blue Shield of New Hampshire have been contacted relative to this motion and assent to the relief requested herein.

3. No memorandum of law is required since the relief requested is within the discretion of the Honorable Court.

WHEREFORE, the Relator, John M. Greabe, prays that this Honorable Court:

A. Approve and order the attached “[Proposed] Consent Confidentiality Order” and “Stipulated Protective Order Governing Confidential Health Information;” and

B. Grant any other such relief as it deems just and proper.

Respectfully submitted,

RELATOR, JOHN M. GREABE

by his attorneys,

WIGGIN & NOURIE, P.A.

Date: December 20, 2007

By: /s/ Richard B. McNamara
Richard B. McNamara, BBO#339420
670 No. Commercial Street, Ste 305
P.O. Box 808
Manchester, NH 03105-0808
(603) 669-2211

Certificate of Service

I hereby certify that a copy of the foregoing Assented-to Motion to Approve and Order Confidentiality Agreements has been forwarded to all counsel of record pursuant to the Court's rules and procedures concerning electronic filing. Any persons not receiving notification through ECF as noted on the Notification of Electronic Filing will be conventionally served via first class mail, postage prepaid:

Nicholas J. Nesgos
Posternak, Blankstein & Lund, LLP
800 Boylston Street, Prudential Tower
Boston, MA 02199-8004

Patricia M. Connolly
Assistant United States Attorney
1 Courthouse Way, Suite 9200
Boston, MA 02210210

Anthony F. Shelley
Adam P. Feinberg
Miller & Chevalier Chartered
655 15th Street, NW, Suite 900
Washington, DC

Michael F. Hertz
Joyce R. Branda
Tracy L. Hilmer
U.S. Dept. of Justice, Civil Div.
PO Box 261, Ben Franklin Station
Washington, D.C. 20044

Michael J. Tuteur
Lawrence M. Kraus
Foley & Lardner, LLP
111 Huntington Avenue
Boston, MA 02199

Date: December 20, 2007

By: /s/ Richard B. McNamara